



THE CITY OF SAN DIEGO

May 7, 2015

County of San Diego
Planning & Development Services
Attn: Dennis Campbell
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Submitted via email to: Dennis.Campbell@sdcounty.ca.gov

Subject: CITY OF SAN DIEGO REQUEST FOR 15-DAY EXTENSION OF PUBLIC REVIEW OF THE DEIR FOR THE OTAY RANCH VILLAGE 13 PROJECT (SCH# 2004101058)

The City of San Diego ("City") has received the Draft Environmental Impact Report (DEIR) for the Otay Ranch Village 13 Master Planned Community, SCH No. 2004101058, GPA 04-003, SP 04-002, TM5361A and TM5361B, REZ 04-009, Environmental Log Number ER 04-19-00 and distributed it to multiple City departments for review. While we appreciate the opportunity to provide comments to the County of San Diego on the adequacy of the DEIR, based on initial comments received from several of the reviewing departments, a 45-day public review period is not a sufficient amount of time for this large of a project which has regional impacts affecting many jurisdictions and resource agencies.

One of the major components of the CEQA process is meaningful disclosure through the public review process. This is a factor for the City because the environmental document will be utilized by the project proponent ("Developer") of the Otay Ranch Village 13 to support discretionary actions which will need to be taken by the City of San Diego in their role as a Responsible Agency under CEQA to issue permits and approval in accordance with the City's Municipal Code and Land Development Code. As such, the environmental analysis and associated document must meet City standards in order to be relied on for those discretionary actions, specifically as they relate to project impacts to City-owned land, public rights-of-way, and open space described below.

Additionally, this is a regional project which will affect many issues of concern to the City of San Diego, an adjacent public agency, such as water quality, recreational trails and uses, land use adjacency, brush management, and MSCP Cornerstone lands. Permits and approvals required under the jurisdiction of the City would include a Site Development Permit in accordance with the City's Environmentally Sensitive Lands Regulation (ESL), a Multi-Habitat Planning Area (MHPA) Boundary Line Adjustment, and easements for expanded road rights-of-way (Otay Lakes Road). This EIR needs to be thoroughly analyzed to determine if issues of concern to the City have been adequately addressed for the City to rely upon for issuance of these discretionary permits.

Planning Department

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Additionally, the DEIR is comprised of many components and is quite lengthy requiring intense and time consuming research to review and determine if the issues of concern are adequately addressed for the reasons outlined above. Our review requires comments from multiple city departments such as the Public Utilities, Park and Recreation, Transportation & Storm Water, Development Services and the Planning Department in order to compile one letter to the County. All of this requires time.

Furthermore, the DEIR incorporates by reference the conclusions and mitigation measures from the Otay Ranch Programmatic EIR which was adopted in 1993. This document is approximately 1521 pages and has taken a significant amount of staff time to review for compliance and consistency. Other large documents must also be reviewed such as the Otay Valley Regional Park Conceptual Plan, County Specific Plan documents and associated Tentative Maps along with numerous technical documents (biology, drainage study, Storm Water Management Plan, and Water Supply Assessment).

For these reason, the City of San Diego, in its role as a Responsible Agency under CEQA respectfully requests a 15-day extension of time to June 8, 2015 to adequately complete our review of the DEIR and submit meaningful comments to the County so that this document can be relied on by the City for processing future discretionary actions within our permitting authority.

Please provide response to this request in writing and via email at mherrmann@sandiego.gov so that all reviewing departments can be notified if the request for an extension of public review has been granted.

Sincerely,

A handwritten signature in blue ink, appearing to read "Myra Herrmann", is written over a light blue horizontal line.

Myra Herrmann, Senior Environmental Planner
Planning Department

cc: Reviewing Departments (via email)
Review and Comment online file